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RE Adoption of the Replacement Tire Efficiency Program (RTEP)

Additional submitted attachment is included below.

California State Senate

CAPITOL OFFICE
1021 O STREET
SACRAMENTO, CA 95814
TEL (916) 651-4019

DISTRICT OFFICE
1885 W. REDLANDS BLVD., SUITE 8C
REDLANDS, CA 92373
TEL (909) 335-0271

SENATOR.OCHOABOGH@SENATE.CA.GOV
SR19.SENATE.CA.GOV

SENATOR

ROSILICIE OCHOA BOGH

NINETEENTH SENATE DISTRICT



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August 19, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Adoption of the Replacement Tire Efficiency Program (RTEP)

Dear Chair and Commissioners,

I write to express my disagreement with the California Energy Commission's recent decision to adopt the Replacement Tire Efficiency Program. While I recognize and share the Commission's goal of reducing emissions, lowering fuel consumption, and helping Californians save money over the useful life of their vehicles, I am deeply concerned that the program's new standards may impose unaffordable upfront costs on many families.

For Californians living paycheck to paycheck, the cost of replacing tires is not a measure of their willingness to support the state's climate goals, it's an immediate and often unavoidable expense. When a tire fails, a family does not always have the time or resources to wait, shop around for the best price, or pay a premium for a product that *might* yield savings over the course of months or years. Requiring and effectively limiting consumers to higher-efficiency tire options risks increasing the cost of a basic necessity for people who are already struggling with the high cost of housing, food, utilities, insurance, and transportation.

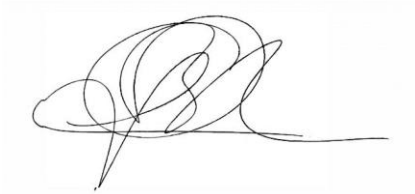
Higher-efficiency tires may offer long-term fuel savings for some drivers, but those long-term savings are only meaningful when a consumer has the ability to absorb higher costs today. California must be cautious about adopting policies that assume every household has the financial flexibility to make an upfront investment, even when that investment may eventually pay for itself.

This concern is not unique to tires, as we've seen time and time again California advances policies based on the promise of future savings, such as our push toward vehicle electrification, home-appliance electrification, or other energy-efficiency upgrades. I am in agreement with the Commission that the savings from those upgrades can be a benefit to the consumer in the long-term, but we must acknowledge the reality that many residents can not afford to replace a functioning gas appliance, purchase a more expensive vehicle, or invest in other upgrades simply because it may be less costly to operate over time.

The same principle applies here: a policy can not be considered equitable if it makes a necessary household product less accessible to the households with the least ability to pay. California's climate and energy policies must be both environmentally responsible, and economically realistic. We should pursue efficiency gains without placing additional financial strain on the very Californians that are seeking support.

I respectfully ask the Commission to revisit this decision with affordability, consumer choice, and equity at the center of its analysis.

Thank you for your consideration,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

ROSILICIE OCHOA BOGH
Senator, District 19